

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**A. PHILIP RANDOLPH INSTITUTE, *et al.*,**

**Plaintiffs,**

**v.**

**Civil Action 2:16-cv-303  
Judge George C. Smith  
Magistrate Judge Elizabeth P. Deavers**

**JON HUSTED,**

**Defendant.**

**PROTECTIVE ORDER**

1. This Protective Order applies to the documents produced in response to subpoenas served by Plaintiffs on the following county boards of election on or about April 25, 2016: Cuyahoga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Wood, Warren, Butler, Delaware, and Franklin.
2. Some of the documents requested in the subpoenas include personal information, including voter names, voter addresses, voter dates of birth, portions of voter social security numbers, Ohio drivers' license numbers, state identification numbers, and potentially other personal information. This information collectively shall be referred to herein as "Personal Identifiers."
3. Without permission of the Court, no document with Personal Identifiers shall be shared with any person or entity other than the parties to this litigation, their lawyers, and any witness, non-party expert witnesses or consultants engaged by counsel of record to a

party to assist such counsel in the prosecution or defense of this action, all of whom shall be bound by this Order.

4. The documents produced in response to the subpoenas can only be used for purposes of this litigation.
5. Within 60 days following conclusion of this litigation and all appeals, Plaintiffs shall destroy all documents containing Personal Identifiers.
6. Personal Identifiers shall not be quoted in any public filings. Instead, the Parties are to use separate anonymous identifiers such as "Person A" and to separately and confidentially disclose to the opposing party's counsel the identity of Person A, so that the opposing party can effectively respond, as needed, to the allegation related to that individual.
7. To the extent it is necessary to attach a document with any Personal Identifiers to any pleading in this litigation, any such document shall be filed under seal or otherwise have all of the Personal Identifiers redacted.
8. Counsel in this matter are **DIRECTED** to provide a copy of this Order to the boards of election (or their counsel) within **ONE (1) DAY** of issuance of this Order. If any board of election has an objection to the Order, the board shall notify the Court of its objection within **FOUR (4) DAYS** of the date of this Order.

**IT IS SO ORDERED.**

Date: May 2, 2016

  
Elizabeth A. Preston Deavers  
United States Magistrate Judge